## REMARKS

### Rejection of Claims of Art Grounds in the 05 May 2004 Office Action, and Traversal Thereof

In the 05 May 2004 Office Action, claims 1, 4-5, 8-9 were rejected under 35 U.S.C. 102(b) as being anticipated by Suzuki et al. reference. Claims 2-3, 6-7, and 10-14 were rejected under 35 U.S.C. 103(a) as being unpatentable over Suzuki et al. in view of Chao et al. (U.S. Pat. No. 6,711,299). The above rejections of the claims 1-14 are traversed, and consideration of the patentability of claims 1-14, as amended, is requested in light of the ensuing remarks.

### Arguments for Patentability

In rejecting claims 1-14, the Examiner cites and strongly relies upon the Suzuki reference to show a software tool that is similar to the present invention. However, the Applicant asserts that the present invention differs substantially from the software tool described in the Suzuki reference and that Suzuki actually teaches away from the intended purpose and use of the present invention. Suzuki describes a *software develpment tool* designed to facilitate the sharing and managing of software design models for use by a distributed software development team. The communication of these design models is accomplished over the Internet for use by the different developers within the design project team. By contrast, the present invention describes a software tool that generates a textual and diagrammatic *documentation of a software project having navigation hyperlinks* that connect images within the diagram to corresponding portions of the textual documentation. Although it is conventional for software

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development tools to contain diagrammatic and textual representations of the source

code, *navigation links* that connect corresponding portions of the diagrammatic and

textual views of a software project *have not been used with software project*

*documentation, and this feature is nowhere described in Suzuki*. Figure 2 on page 132

of the Suzuki reference shows two views of a software development project including a

textual (XML editor) and diagrammatic (XML browser) representations. As stated above,

while textual and diagrammatic views of the source code have been used for software

design projects (as shown in Figure 2 of Suzuki), such textual and diagrammatic views

have *not* been used with source code documentation especially when created *in a HTML*

*format that features hypertext navigation links* between corresponding portions of the

two views.

Importantly, the Suzuki reference restricts itself to using a UML exchange format

(UXF) for software programming whereas the present invention is specifically directed

toward and restricted to using the hypertext markup language (HTML) for software

documentation. In fact, Suzuki actually excludes the use of HTML for the use described

in Suzuki for reasons provided therein. Again, these differences in approach and

preferences between the present invention and the Suzuki reference highlight the different

intended uses for each invention and further demonstrate that the Suzuki reference is

distinguished from the present invention.

The Examiner rejects a few of the claims as being unpatentable over Suzuki in

view of Chao (U.S. Pat. No. 6,711,299). Chao describes an invention which allows the

compression of image files using a novel wavelet-based transformation. As described on

lines 35-44, column 26 of Chao, the compression method and system includes the

compression of image files contained within an image map in HTML format. However, the process of compressing image files associated with a software program is clearly distinguishable from a software tool used to document the textual and diagrammatic representations of the source code in HTML format that contains navigation links between corresponding portions of the textual and diagrammatic views. The Applicant asserts that the prior and general usage of links contained within an interactive HTML document or image map does not teach the specific use of navigation links existing between textual and diagrammatic representations contained within documentation of the source code. The Applicant respectfully asserts that the comparison of the present invention to the Chao patent is improperly made in hindsight. Therefore, one skilled in the art would *not* consider the novel inclusion of navigation links connecting corresponding portions of a diagrammatic and textual representation of software source code to be obvious in view of the other uses of HTML documentation and particularly in view of a software compression method or system.
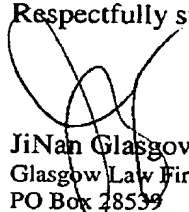
## CONCLUSION

In view of the foregoing, claims 1-21, now amended, constituting the claims pending in the application, are submitted to be fully patentable and in allowable condition to address and overcome the rejections.

If any issues remain outstanding, incident to the allowance of the application, Examiner Tang is respectfully requested to contact the undersigned attorney at (919) 664-8222 or via email at jinang@trianglepatents.com to discuss the resolution of such issues, in order that prosecution of the application may be concluded favorably to the

applicant, consistent with the applicant's making of a substantial advance in the art and

particularly pointing out and distinctly claiming the subject matter that the applicant

regards as the invention.

This Office Action response is submitted via fax to the official group fax number at

703.872.9306 on August 4, 2004

Respectfully submitted,

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